

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

NETLIST, INC.,

Plaintiff,

v.

MICRON TECHNOLOGY, INC., MICRON  
SEMICONDUCTOR PRODUCTS, INC., and  
MICRON TECHNOLOGY TEXAS LLC,

Defendants.

Civil Action No. 1:22-cv-00134-LY

**JURY TRIAL DEMANDED**

NETLIST, INC.,

Plaintiff,

v.

MICRON TECHNOLOGY, INC., MICRON  
SEMICONDUCTOR PRODUCTS, INC., and  
MICRON TECHNOLOGY TEXAS LLC,

Defendants.

Civil Action No. 1:22-cv-00136-LY

**JURY TRIAL DEMANDED**

**DECLARATION OF CHUN KI HONG IN SUPPORT OF  
PLAINTIFF NETLIST, INC.'S OPPOSITION TO DEFENDANTS' MOTION TO STAY  
PENDING *INTER PARTES* REVIEW OF THE ASSERTED PATENTS**

I, CHUN KI HONG, declare as follows:

1. My name is CHUN KI HONG. I am the Chief Executive Officer and founder of Netlist, Inc., a leading innovator in high-performance memory module technologies.

2. It is by virtue of my position and involvement that I have personal knowledge of the matters set forth below.

3. Netlist sent a RAND-licensing offer letter to Micron Technology, Inc. on April 28, 2021.

4. Following several weeks of back-and-forth communications with Micron, Netlist determined that Micron did not appear interested in engaging in RAND negotiations and proceeded to serve the complaints in these cases.

5. Attached as Exhibit A is a true and correct copy of the letter sent by Marc Frechette, then Netlist's Chief Licensing Officer to Sanjay Mehrotra, President & CEO of Micron, on April 28, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of April, 2022, in Seoul, Korea.

Respectfully submitted,



Chun Ki Hong